

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: February 7, 2005

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Agency: CDPHE

Purpose of Contact: Disposition of Area 4 Survey unit 17

Discussion

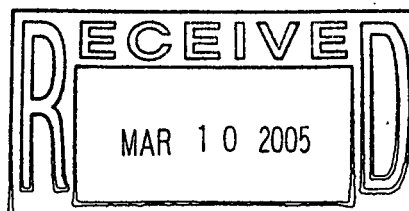
In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Area 4, survey unit 17 for demolition. Survey unit 17 consisted of rooms 415 through 429 and room 431.

The preparation process for survey unit 17 was initiated April 30, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, it was determined that the in process and final surveys could be combined and the CDPHE representative concurred with this approach. The area was surveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving and hotspot removals were performed on a few floor and wall surfaces.
- Some block walls were removed.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in survey unit 17. The following summarizes the non-radiological activities:

- There were three RCRA permitted storage areas in rooms 416, 416B, and 427 that were part of Unit 777.1. These areas were closed administratively through a request submitted to CDPHE on July 30, 2001
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Rooms 415, 416, 416A, 418, 419, 424, 427, and 427A were listed on the historical list of rooms with potential beryllium contamination. The baseline beryllium characterization of these rooms was conducted by KH in 1999; removable beryllium



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contamination was discovered in rooms 418 and 424 and they were posted as Beryllium Controlled Areas. After equipment removal, decontamination, and re-sampling, these rooms were de-posted as beryllium areas. Subsequent surveys following equipment removal have found no removable beryllium present in this survey unit. Forty-seven (47) additional samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm².

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside survey unit 17 has progressed to the point of reasonably achievable.

In summary, ALARA-based decontamination has been completed, Survey unit 17 will be surveyed for removable contamination, and controls applied during demolition. Due to the low levels of contamination in survey unit 17, encapsulation is not required, and the unit will not be painted. This contact record will be placed in the demolition file for this survey unit.

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